



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TEXAS 75202-2733

August 24, 2010

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED: 7003 0500 0003 0866 9641**

Mr. Rob King  
Energy Transfer Company Texas Pipeline Ltd.  
Director of Operations  
8711 County Road 916  
Godley, TX 76044

Re: Administrative Compliance Order Docket Number: CAA-06-2010-3312  
Facility Registry System Number: 110033851357

Dear Mr. King:

Enclosed is an Administrative Compliance Order (Order) issued to Energy Transfer Company Texas Pipeline Ltd., for violation of the Clean Air Act (42 U.S.C. § 7412(r)(1)). The violation was identified based on our August 19, 2010, inspection of your Godley Gas Plant facility located in Godley, Johnson County, Texas, and designated as Facility Registry System Number 110033851357. The general duty clause violation found consists of an unpermitted release of an extremely hazardous substance; specifically, methane.

Effective upon receipt of this Order, you shall immediately fix, repair or replace the leaking components as noted in the enclosed Order, and comply with the provisions of this Order. The Environmental Protection Agency is committed to ensuring compliance with the requirements of the Clean Air Act, and my staff will assist you in any way possible.

If you have any questions, please contact, Tony Robledo, of my staff, at (214) 665-8182.

Sincerely,

A handwritten signature in black ink, appearing to read "John Blevins".

John Blevins  
Director  
Compliance Assurance and  
Enforcement Division

Enclosure

cc: Michael de la Cruz  
Manager, Air Enforcement Section  
Texas Commission on Environmental Quality

U.S. ENVIRONMENTAL PROTECTION AGENCY-REGION 6  
ADMINISTRATIVE COMPLIANCE ORDER  
In the Matter of Devon Gas Services, L.P., Respondent  
Docket No. CAA-06-2010-3312

STATUTORY AUTHORITY

The following findings are made and Administrative Compliance Order (Order) issued under the authority vested in the Administrator of the United States Environmental Protection Agency (EPA), by Section 113(a)(3) of the Clean Air Act (Act), 42 U.S.C. § 7413(a)(3). The Administrator has delegated the authority to issue this Order to the Regional Administrator of EPA Region 6 who has further delegated such authority to the Director of the Compliance Assurance and Enforcement Division.

FINDINGS

1. Respondent, Energy Transfer Company Texas Pipeline Ltd., is a "person" as defined by Section 302(e) of the Act, 42 U.S.C. § 7602(e).

2. At all times relevant to the violation alleged herein (relevant time period), Respondent operated a natural gas processing facility (Godley Gas Plant) located in Godley, Johnson County, Texas (the "Facility").

3. The Facility is a "stationary source" as defined by Section 112(r)(2)(C) of the Act, 42 U.S.C. 7412(r)(2)(C).

4. On August 19, 2010, EPA inspectors observed an unpermitted release of pollutants from two (2) engine/compressor packing vents (unit identification nos. C-10 and C-11) utilizing the FLIR® Gas Finder Infrared Camera.

5. Based on information in the Title V Permit, the Facility Gas Analysis, and utilizing the FLIR® Gas Finder Infrared Camera, the EPA inspectors determined that the unpermitted release of pollutants described in paragraph (four) 4 contained methane.

6. Methane is described as highly flammable/explosive in the Material Safety Data Sheet as provided by the Facility.

7. An extremely hazardous substance under Section 112(r) of the Act, 42 U.S.C. § 7412(r) includes, but is not limited to, methane. The engine/compressor packing vents are not an appropriate source for fugitive emissions and are potentially subject to explosive levels of methane.

8. Section 112(r)(1) of the Act, 42 U.S.C. § 7412(r)(1), requires owners and operators to design and maintain a safe facility, taking such steps as are necessary to prevent releases of extremely hazardous substances.

9. On August 19, 2010, Respondent released an unpermitted emission containing methane into the ambient air from a stationary source in violation of Section 112(r)(1) of the Clean Air Act (Act), 42 U.S.C. § 7412(r)(1).

ORDER

Based on these findings and pursuant to the authority of Section 113(a)(3) of the Act, 42 U.S.C. § 7413(a)(3), EPA orders that Respondent take the following actions upon receipt of this Order.

1. Fix, repair, or replace the leaking components that led to the unpermitted release of an extremely hazardous substance as described in paragraph (four) 4, upon receipt of this Order.

2. Within fifteen (15) days of the effective date of this Order, Respondent shall provide written certification to the EPA, Region 6, that these activities have been completed.

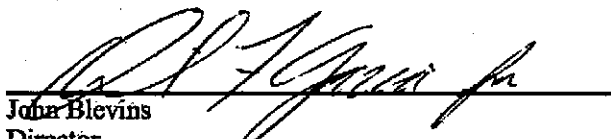
GENERAL PROVISIONS

Issuance of this Order shall not be deemed an election by EPA to waive any administrative, judicial, civil or criminal action to seek penalties, fines or other relief under the Act for the violation alleged herein or other violations which may become known to EPA. EPA reserves the right to seek any remedy available under the law which it deems appropriate.

Failure to comply with this Order or the Act may result in the initiation of an administrative penalty action by EPA or a civil judicial penalty action by the U.S. Department of Justice.

Compliance with this Order does not relieve Respondent of its obligation to comply with all applicable federal, state and local laws.

8/24/10  
Date

  
John Blevins  
Director  
Compliance Assurance and  
Enforcement Division